



Ms. Tracie Billington and Mr. Joe Yun
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Division of Integrated Regional Water Management
Financial Assistance Branch
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May 12, 2014

**SUBJECT: Central Coast Funding Region Coordinated Comments on the 2014 IRWM
Drought Solicitation Guidelines and PSP, April 2014**

Dear Ms. Billington and Mr. Yun,

The Central Coast Funding Area and all individual IRWM Regions therein, specifically Santa Cruz County; Pajaro River Watershed; Greater Monterey County; Monterey Peninsula, Carmel Bay, and South Monterey Bay; San Luis Obispo County; and Santa Barbara County, have been active and participatory in the IRWM program since its inception. As a whole as well as individually, we have benefited through Propositions 50 and 84 and are grateful to DWR staff for their on-going communication, interest in obtaining and integrating feedback on the IRWM program and improving the overall IRWM process and program. In the spirit of the overall IRWM program, the individual IRWM Regions have been coordinating and collaborating on issues in our shared watershed and groundwater basins, in addition to dialoging on issues of inter-regional equity of funding and shared interests.

As part of this collaboration, the IRWM Regions cited above have drafted the following set of comments on the 2014 IRWM Drought Solicitation Guidelines and PSP, April 2014.

1. Our regions are in strong support of the allocation of the \$200 million available in this solicitation to be proportionately rationed on a regional level as opposed to a statewide competition for funds. Absent a region-specific methodology, we request that DWR place a funding cap per funding region on the monies available through this expedited round. The purpose of this cap would be to ensure funding is available in each



hydrologic region to address current drought response needs in the current round, while preserving enough funds to address other critical water management needs through the 2015 IRWM Implementation solicitation. We suggest that the funding be capped at 50% of the overall regional allocation. Therefore, as the Central Coast Funding Area has a remaining balance of \$19,748,065, we recommend that the Drought Solicitation Allocation for the Central Coast Funding Area be capped at \$9,874,033.

2. The foreword to the Draft PSP describes a two-step process wherein applicants would submit a “high-level” proposal for initial review by DWR and, if selected for potential funding by DWR, the applicant would follow up with additional documentation. The definition of what constitutes a high level proposal is not clear. Are the requirements contained in the PSP for an application submittal considered the “high level” proposal? In light of the extent and depth of the documentation required for assembly and writing of a competitive grant application, our regions would respectfully request that DWR extend the Grant Application Submittal Deadline to allow for a minimum of 45 days for application preparation and submittal, but a preferred application preparation and submittal deadline of 60 days.
3. As DWR is aware, the entire hydrologic region has been suffering through an extreme drought, hence release of the 2014 IRWM Drought Solicitation Guidelines and PSP. Responding expeditiously to these conditions requires our agencies to marshal resources beyond and above what are normally required of us. This emergency, coupled with our desire to maximize IRWM funding through this Round and prepare applications for needed projects in an extremely time sensitive manner, places a heavy burden our RWMGs and stakeholders. Therefore, we respectfully request an extension on the IRWM Plan submittal deadline to allow for regions that are grappling with these circumstances to comply on a protracted timetable. We request that at a minimum DWR extend the Adopted Plan and Proof of Formal Adoption submittal to the draft funding award date. Alternatively, DWR could allow each Region to comply with previously established contractual deadlines (e.g. two years from execution of an Implementation Grant Agreement).
4. Our regions advocate that the CASGEM Compliance eligibility requirement not go beyond what is indicated in CWC §10920 *et seq.*, 10927, 10933.5, and 10750 (i.e. for high or medium priority basins, a monitoring entity has been established and DWR is not monitoring those basins). Regions and agencies currently working with DWR to comply



with the water code associated with CASGEM should not be excluded from drought grant funding.

We thank DWR for the opportunity to provide comments and as the Central Coast IRWM Regions are happy to discuss the contents of this letter.

Sincerely,

Bret Stewart
Program Manager
Santa Barbara County IRWM

Mary Bannister
General Manager
Pajaro Valley Water Management Agency

Susan Robinson
Program Manager
Greater Monterey County IRWM

Larry Hampson
District Engineer, MPWMD
Monterey Peninsula IRWM

Sincerely,

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